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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF SONAL N. MEHTA
IN COMPLIANCE WITH THE COURT'S
MARCH 23, 2022 ORDER**

Judge: Hon. James Donato

1 I, Sonal N. Mehta, declare as follows:

2 1. I am a Partner at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Meta
3 Platforms, Inc. in the above-captioned case. I submit this declaration consistent with the Court's
4 March 23, 2022 Order. Dkt. No. 263. The contents of this declaration are based on my personal
5 knowledge.

6 2. On Friday, April 8, 2022, my partner David Gringer, and lead counsel for the
7 Advertiser Plaintiffs, Yavar Bathaee and Kristen Anderson, met and conferred in person at
8 WilmerHale's office in New York, New York, to resolve the disputes raised in Dkt. Nos. 230
9 and 259 in accordance with the Court's Order at Dkt. No. 263. Lead counsel for the User
10 Plaintiffs, Stephen A. Swedlow of Quinn Emanuel Urquhart & Sullivan LLP, and Shana A.
11 Scarlett of Hagens Berman Sobol Shapiro LLP participated via video conference. Although Ms.
12 Scarlett and I reside within 100 miles of each other, Ms. Scarlett advised me that she would be
13 out of the country on April 8 and thus would not be able to meet and confer in person.
14 Accordingly, I participated via video conference.

15 3. During the meet and confer, Meta and Advertiser Plaintiffs reached a resolution
16 on the scope of Interrogatory No. 1. Meta and User Plaintiffs reached a resolution on
17 Interrogatory Nos. 1 and 2.

18 4. Meta and User Plaintiffs continue to meet and confer about User Plaintiffs'
19 obligation to respond to Interrogatory Nos. 3 and 4, and are hopeful that the parties will be able
20 to reach a resolution. The parties will file either a joint letter identifying the outstanding dispute
21 for the Court to resolve or a stipulation outlining the agreement no later than Wednesday, April
22 20, 2022.

23 I declare that the foregoing is true and correct under penalty of perjury.

24 Executed on this 15 day of April, 2022, in Palo Alto, California.

25 By: /s/ Sonal N. Mehta
26 Sonal N. Mehta
27
28

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that the other signatories have concurred in
this filing.

Dated: April 15, 2022

By: /s/ Sonal N. Mehta
Sonal N. Mehta